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2010 NOV 18 PM 2:39

OFFICE OF GENERAL  
COUNSEL

Joseph "Skip" Brion  
Chairman

15 South Church Street, West Chester, PA 19382  
(610) 696-1842 • FAX 696-1224  
www.republicanccc.com

November 18, 2010

**VIA REGULAR MAIL & FACSIMILE**  
**202-219-3923**

Jeff S. Jordan, Esquire  
Federal Election Commission  
999 E. Street, NW  
Washington, DC 20463

**Re: MUR 6418**

Dear Mr. Jordan:

I am the Solicitor for the Republican Committee of Chester County ("RCCC" or "County Party") and I write in response to your letter of November 4, 2010.

It is our understanding that the circumstances referenced in your letter did not in fact give rise to the need to register, and consequently there was no need to report. I wanted to clarify that the subject videos were actually produced by a volunteer and the County Party did not pay for said videos. Consequently, we believed the posting of said videos fell within the volunteer activity on the internet exemption. What the County Party did pay for was to host a website on which the videos were displayed but that cost was only \$300.00 and thus did not approach the applicable reporting threshold.

With reference to the disclaimer, we acknowledge it may have been ambiguous or incomplete. We now recognize that such disclaimers in addition to having the "paid for" language should also have the "authorized by" language.

Future volunteers will be informed of the disclosure requirements. Please recognize that the RCCC and its volunteers did their best to comply with the complex federal election laws.

***Of, By And For The People Of Chester County***

Paul Andriole  
Treasurer

Nancy Toner  
Secretary

Michelle Kichline  
Assistant Secretary

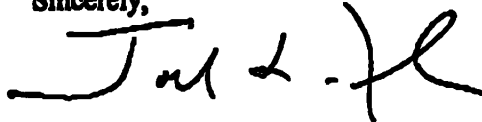
Leonard Rivera  
Financial Secretary

Joel L. Frank, Esq.  
Solicitor

11044304002

Thank you for your consideration of the matters raised herein.

Sincerely,

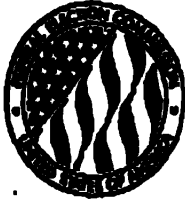
A handwritten signature in black ink, appearing to read "Joel L. Frank", with a stylized flourish at the end.

Joel L. Frank

JLF/cd

cc: Skip Brion, Chairman

11044304003



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## STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each Respondent/Entity/Treasurer.  
FAX (202) 218-3923

MUR # 6418NAME OF COUNSEL: Joel L. FrankFIRM: Lamb McErlane PCADDRESS: 24 E. Market St.West Chester PA 19381TELEPHONE- OFFICE (610) 430-8000FAX (610) 692-0877

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/18/10  
Date

Paul R. Rasmussen  
Respondent/Agent -Signature

Executive Director  
Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Republican Committee of Chester County

MAILING ADDRESS: 15 South Church St.  
(Please Print)

West Chester, PA 19382

TELEPHONE-HOME ( )

BUSINESS (610) 6096-1842

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.